

ORIGINAL

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

FILED
U.S. DIST. COURT
SAVANNAH DIV.

MAR 2 4 50 PM '98

CLERK. *DS'lw*
SO. DIST. OF GA.

IN RE:)
APPLICATION OF WATCHE AGHICHE and)
RAFI MANOUKIAN TO OBTAIN CERTAIN)
DOCUMENTS OF GULFSTREAM AEROSPACE) CASE NUMBER: 498-20
CORPORATION FOR USE IN AN ACTION)
PENDING IN THE HIGH COURT OF)
JUSTICE, QUEEN'S BENCH DIVISION,)
COMMERCIAL COURT, LONDON, ENGLAND,)
_____)

BRIEF IN SUPPORT OF MOTION TO COMPEL GULFSTREAM AEROSPACE
CORPORATION TO RESPOND TO SUBPOENA ISSUED PURSUANT TO
ORDER OF THIS COURT ENTERED HEREIN ON FEBRUARY 26, 1998

With respect to documents GAC000005 and GAC000006-10, it is respectfully submitted that there is no such privilege as "internal company proprietary." Reference to the Manoukians, the Applicants herein, cannot be regarded as confidential. Applicants are perfectly willing to accept documents which have been redacted, as far as they relate to truly private records, if the Court should determine that such matters should be redacted.

It is respectfully requested that this Honorable Court immediately order Gulfstream Aerospace Corporation to furnish the documents which it had indicated its willingness to furnish and to further inspect the documents *in camera*, particularly documents GAC000005 and GAC000006-10.

RESPECTFULLY SUBMITTED THIS 2ND DAY OF MARCH, 1998.

BOUHAN, WILLIAMS & LEVY LLP

A handwritten signature in dark ink, appearing to read "Walter C. Hartridge", is written over a horizontal line.

Walter C. Hartridge

Georgia State Bar # 334900

Carlton E. Joyce

Georgia State Bar # 405515

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CERTIFICATE OF SERVICE

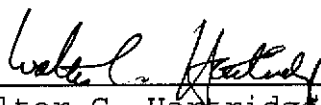
I, WALTER C. HARTRIDGE, do hereby certify that I have this day served the following counsel of record with a copy of the foregoing pleading by telefax, hand delivery, and by placing a copy of same in the United States mail with proper postage affixed thereto, as follows:

Thomas M. Ramee, Esq., telefax 965-4764
Deputy General Counsel
Post Office Box 2206
Savannah, GA 31402

Michael D. Robl, Esq., telefax 236-4936
Hunter, Maclean, Exley & Dunn
200 East St. Julian Street
Savannah, GA 31401

THIS 2ND DAY OF MARCH, 1998.

BOUHAN, WILLIAMS & LEVY LLP



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